LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

TRIAL BURN REPORT OUTLINE



PREPARED BY LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ENGINEERING GROUP 3

2003

Form_5001_r00 December 4, 2003 Page 1 of 11

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

GUIDANCE FOR ORGANIZATION, CONTENT AND FORMAT

TRIAL BURN REPORT

(notes are in italics)

CERTIFICATION FORM
TABLE OF CONTENTS
LIST OF FIGURES
LIST OF TABLES
LIST OF APPENDICES

1.0 SUMMARY OF TEST RESULTS

- **1.1** Summary of RCRA Compliance Test Results
- **1.2** Summary of Unit Operating Conditions Actual vs. Planned
- **1.3** Deviations from the approved Trial Burn Plan and the Impacts (see CPM, Exhibit 6.0 1)
- **1.4** Performance Evaluation (Audit) Results Summary
- **1.5** Conclusions

2.0 INTRODUCTION/PROCESS DESCRIPTION

- **2.1** Brief Unit Description
- 2.2 Test Objectives Overview
- 2.3 Test Responsible Parties
- 2.4 Test Chronology
- 2.5 Summary of RCRA Process Monitors (See CPM, Exhibit 5.0-1)
- **2.6** Process Flow Diagram with Monitoring and Sampling Points (See CPM, Exhibit 5.0-2)

3.0 OPERATING DATA SUMMARY TARGET OPERATING CONDITIONS

- 3.1 Feed Rate Data
 - **3.1.1** Waste Feed Rates (per waste stream, as fed)
 - **3.1.2** Other Feedstream Flow Rates
 - **3.1.2.1** Combustion Airflow Rates (in acfm, scfm, and dscm/min) (including Recirculation air)
 - **3.1.2.2** Auxiliary Fuel
 - **3.1.2.3** Vapor Recovery (Vent Stream) Feedstreams
- **3.2** Combustion Chamber Temperature (PCC and SCC)
- **3.3** Combustion Chamber Pressure (PCC and SCC)
- **3.4** Atomizing Pressure (PCC and SCC)
- **3.5** Stack Gas Flow Rate (If measured by plant instrumentation)
- 3.6 Production Rate
- 3.7 Other Combustion Unit Operating Data
- 3.8 Air Pollution Control Equipment (APCE) Operating Data Vs. Target Conditions
 - **3.8.1** High Energy Scrubber
 - 3.8.2 Low Energy Scrubber
 - **3.8.3** Dry Scrubber

- 3.8.4 Ionizing Wet Scrubber (IWS)
- **3.8.5** Electrostatic Precipitator (ESP)
- 3.8.6 Baghouse
- 3.8.7 Catalytic Oxidizer
- 3.8.8 Activated Carbon Injection System
- 3.8.9 Other APCE

4.0 FEEDSTREAM SAMPLING AND ANALYSIS

- 4.1 Sampling Locations
- **4.2** Sampling and Analytical Methods
- **4.3** Characterizations (Any use of process knowledge must be indicated)
 - **4.3.1** Waste Feed Analysis
 - **4.3.2** Other Feedstream Analysis (e.g. process vents)
- 4.4 Constituent Feedrates
 - **4.4.1** Antimony Feedrate
 - 4.4.2 Arsenic Feedrate
 - 4.4.3 Barium Feedrate
 - **4.4.4** Beryllium Feedrate
 - **4.4.5** Cadmium Feedrate
 - **4.4.6** Chromium Feedrate
 - 4.4.7 Lead Feedrate
 - **4.4.8** Mercury Feedrate
 - 4.4.9 Silver Feedrate
 - 4.4.10 Thallium Feedrate
 - 4.4.11 Chlorine Feedrate
 - **4.4.12** Ash Feedrate
 - 4.4.13 POHC Feedrate

5.0 RCRA EMISSIONS AND PERFORMANCE RESULTS

- **5.1** Stack Sampling Locations
- **5.2** Metals Sampling Train
 - **5.2.1** Sampling and Analytical Methods
 - **5.2.2** Antimony Emission Results
 - 5.2.3 Arsenic Emission Results
 - 5.2.4 Barium Emission Results
 - **5.2.5** Beryllium Emission Results
 - 5.2.6 Cadmium Emission Results
 - 5.2.7 Chromium Emission Results
 - 5.2.8 Lead Emission Results
 - **5.2.9** Mercury Emission Results
 - 5.2.10 Silver Emission Results
 - **5.2.11** Thallium Emission Results
- **5.3** HCI/Chlorine Sampling Train
 - **5.3.1** Sampling and Analytical Methods
 - 5.3.2 HCl/Cl₂ Emission Results
- **5.4** Particulate Sampling Train
 - **5.4.1** Sampling and Analytical Methods
 - 5.4.2 PM Emission Results
- **5.5** Destruction and Removal Efficiency (DRE)
 - **5.5.1** Sampling and Analytical Methods
 - 5.5.2 POHC Emission Rates

- **5.5.3** DRE Calculation
- 5.6 CEMS Monitoring Results for Oxygen, Carbon Monoxide, and/or Hydrocarbons

6.0 APCE RESIDUE SAMPLING AND ANALYSIS

- **6.1** Sampling Locations
- **6.2** Sampling and Analytical Methods
- **6.3** Characterizations (Any use of process knowledge must be indicated)
 - **6.3.1** Ash
 - 6.3.2 APCE blowdown
 - **6.3.3** Other APCE Residues

7.0 QUALITY ASSURANCE/QUALITY CONTROL DOCUMENTATION

- **7.1** Project Personnel and Responsibilities
- **7.2** Quality Assurance/Quality Control Objective Results
 - **7.2.1** Evaluation of Precision
 - **7.2.2** Evaluation of Accuracy
 - **7.2.3** Detection and Reporting Limit Determination
 - 7.2.4 Evaluation of Completeness
- 7.3 Sample Handling, Traceability, and Holding Time Results
- 7.4 Calibration Procedures, Frequency, and Results
 - **7.4.1** Process Monitoring Equipment
 - 7.4.2 Stack Sampling Equipment
 - 7.4.3 Continuous Emission Monitoring Equipment
- **7.5** Analytical Procedures and Internal QC Check Results
- 7.6 Analytical Equipment Used and Maintenance Records
- 7.7 Performance Evaluation (Audit) Results (Detailed)
- 7.8 QAPP Deviations, Corrective Actions, and Audits
- **7.9** Data Validation and Verification
 - 7.9.1 Validation Results
 - **7.9.2** Total Train Calculations (provide example for each type)
 - **7.9.3** Verify Usability of Results

8.0 PROPOSED PERMIT LIMITS

- 8.1 Combustion Unit Operating Parameter Limits
- **8.2** APCE Operating Parameter Limits

9.0 RISK ASSESSMENT DATA SAMPLING AND ANALYSIS

NOTE: Any information submitted under Section 5.0 of this report may be referenced instead of repeated in this section.

- **9.1** Dioxin/Furan Sampling Train
 - 9.1.1 Sampling and Analytical Methods
 - 9.1.2 Dioxin/Furan Emission Results
 - 9.1.3 Toxicity Equivalency Results
- 9.2 Volatile Organic Compounds
 - **9.2.1** Sampling and Analytical Methods
 - 9.2.2 Volatile Organic Emission Results
- 9.3 Semivolatile Organic Compounds
 - **9.3.1** Sampling and Analytical Methods
 - **9.3.2** Semivolatile Organic Emission Results
- **9.4** Polycyclic Aromatic Hydrocarbons (PAHs)

- **9.4.1** Sampling and Analytical Methods
- 9.4.2 PAHs Emission Results
- 9.4.3 Benzo(a)pyrene
- 9.4.4 Toxicity Equivalency Results
- **9.5** Total Organic Emissions (TOE)
 - **9.5.1** Sampling and Analytical Methods
 - 9.5.2 TOE Emission Results
- **9.6** Particle Size Distribution (PSD)
 - **9.6.1** Sampling and Analytical Methods
 - 9.6.2 PSD Results
- **9.7** Polychlorinated Biphenyls (PCBs)
 - **9.7.1** Sampling and Analytical Methods
 - **9.7.2** PCBs Emission Results

10.0 METHODS FOR CONTINUING COMPLIANCE

How the facility plans to retain compliance with its RCRA limits.

APPENDIX A - STACK SAMPLING REPORT

- **A.1** Narrative
- **A.2** Summary of sampling and stack gas conditions (*Include sample volumes, molecular weight, moisture, stack gas temperature and flow, etc.*)
- A.3 Calculation of sample point locations, in accordance with Method 1
- **A.4** Example calculation of average velocity/volumetric flow rate, in accordance with Method 2
- A.5 Example calculation of dry molecular weight, in accordance with Method 3
- A.6 Example calculation of moisture content, in accordance with Method 4
- **A.7** Field Data Sheets. Organized by method, then condition and run, included for all methods and all completed runs. Field data sheets should be copies of originals and not rewritten.
- **A.8** Independent CEMS information. This should include calibration data and data collected from the CEMS during testing.
- **A.9** Analyses performed by stack sampling company (Include summary and full data package. Data package must follow analytical data package format.)
- A.10 Stack sampling equipment calibration data
- A.11 Certification of Lab Accreditation Status

APPENDIX B - FEEDSTREAM SAMPLING REPORT

- **B.1** Field Sampling Logs. *Indicate sampling method, time, and frequency. Field data sheets should be copies of originals and not rewritten.*
 - **B.1.1** Vent Feed Sampling
 - **B.1.2** Waste Feed Sampling
 - **B.1.3** Residue Sampling (e.g. scrubber effluent)
- **B.2** Process knowledge and how obtained (if applicable)

APPENDIX C – SPIKING REPORT

- **C.1** Narrative. Include details on technique, injection point, spiking solutions, QA/QC, and any problems incurred.
- **C.2** Certificates of Analysis for Spiking Solutions

- **C.3** Field Logsheets. Field data sheets should be copies of originals and not rewritten.
- **C.4** Run Totalizer Data (if continuous measurement device used)
- **C.5** Data in graphical form (if available)
- **C.6** Data in tabular form (include date and time)
- **C.7** Pre- and Post-Test Calibration Sheets for Spiking Equipment

APPENDIX D - QA/QC DATA REPORT

- **D.1** Field Sampling QA/QC
 - **D.1.1** Field data collected for QA/QC. This includes trip blanks, equipment rinses, reagent blanks, blank trains, etc. Include description of what was collected, how it was collected, and when it was collected.
 - **D.1.2** Audit report of field activities (provided by the QAO or 3rd party auditor)
- **D.2** Overall Lab QA/QC (provided by the QAO)
 - **D.2.1** Internal audit results
 - **D.2.2** Performance evaluation checks. *Include results of all audits, i.e. VOST, metals, hexavalent chromium. chlorine. and dioxin/furan.*
 - **D.2.3** Data quality validation and verification
 - **D.2.4** Data quality assessment report

APPENDIX E - CALIBRATION DATA

- **E.1** Process Monitoring Equipment, i.e. thermocouples, pH meters, flowmeters
- **E.2** CEMS, including gas cylinder certificates and daily calibration results

APPENDIX F - SAMPLE EMISSIONS CALCULATIONS

- **F.1** Nomenclature Table with terms, acronyms, and abbreviations
- **F.2** Example Calculations. For ANY and ALL calculations in the report, including units on everything. Equations must be explained in detail and contain any necessary references to equation development and data used in the equations. Data calculations must explain the handling of non-detect values and blank corrections.
 - **F.2.1** Feed rate calculations
 - **F.2.2** Stack sampling calculations (unless included in Appendix A)
 - **F.2.2.1** Volume of dry gas sampled
 - F.2.2.2 Volume of water vapor collected
 - **F.2.2.3** Percent moisture
 - **F.2.2.4** Average molecular weight of stack gas
 - F.2.2.5 Percent excess air at sample point
 - **F.2.2.6** Percent isokinetic sampling
 - **F.2.2.7** DRE and SRE (as applicable)
 - **F.2.2.8** Particulate emissions results. *Including cyclone, probe, filter, stack gas concentration at actual and STP conditions, emission rate, and size distribution.*
 - **F.2.2.9** Metals emissions results. *Including filter, impinger content, stack gas concentration at actual and STP conditions, emission rate, and metals removal efficiency. Include calculations for metals extrapolation.*
 - **F.2.2.10** HCI/Chlorine emissions results. *Including impinger content, stack gas concentration at actual and STP conditions, emission rate, and removal efficiency.*

F.2.2.11 Organic emissions results. *Including XAD, tenax/tenax-charcoal, stack gas concentration at actual and STP conditions, emission rate.*

F.2.3 Other

APPENDIX G- OPERATING DATA REPORT

- **G.1** Process Data. Organized by condition and by run, including time and all regulated parameters (with units of measurement), i.e. combustion chamber temperature, hazardous waste feed rate, vent flow rate, inlet temperature to APCE, CEMS data, etc. Data must start when sampling starts and end at or after sampling completion.
 - **G.1.1** Data in tabular form
 - **G.1.2** Data in graphical form (trend diagrams) (if available)
- **G.2** Data on batch feed sizes and blending ratios
- **G.3** Fugitive Emissions Inspection Logs (Applicable if unit does not comply with negative pressure requirement.)

APPENDIX H – FIELD LOGS (Data collected and/or observations made by personnel)

- **H.1** Facility Personnel (if available)
- H.2 Test Coordinator
- H.3 Quality Assurance Officer
- **H.4** Process Samplers
- **H.5** Lab Personnel (if present in the field)
- **H.6** 3rd party auditor, if required (Unless report is submitted to the Agency as a separate report.)
- H.7 Sample Custodian

APPENDIX I – ANALYTICAL DATA PACKAGES

Separate individual lab packages with tabbed dividers. Analytical data packages must follow the format guidance provided.

APPENDIX J - RESUMES

For all personnel listed on the project's organizational chart

ABBREVIATIONS

CPM = Hazardous Waste Combustion Permitting Manual, EPA Region 6, 1998.

LIST OF TABLES

- 1.1 Summary of Key Results
- **1.2** Summary of Key Operating Parameters
- **1.3** Summary of Deviations and Exceptions
- **2.1** Testing Schedule
- 3.1 Mass Feed Rates and Heat Input
- **3.2** Operating Data Summary for Condition
- **4.1** Waste Stream #1 Characterization
- 4.2 Waste Stream #2 Characterization
- 4.3 Constituent Feed Rates
- **4.4** Cross Reference Data Table for Feedstream Sampling and Analysis
- 5.1 Stack Sampling Summary of Actual Stack Gas Flow Rate, Dry Standard Stack Gas Flow Rate, Temperature, and Sampling Time
- **5.2** Method 0060 Sampling Train Operating Data (Multiple Metals)
- **5.3** Method 0061 Sampling Train Operating Data (Hexavalent Chromium)
- 5.4 Metal Emissions
- **5.5** Method 0050 Sampling Train Operating Data (PM, HCl, Cl₂)
- **5.6** Emission Results for PM, HCl, and Cl2
- **5.7** Method 0010 Sampling Train Operating Data (Semivolatile Organics, TCO/GRAV)
- **5.8** Semivolatile POHC Destruction and Removal Efficiency
- **5.9** Method 0030 Sampling Train Operating Parameters (VOST)
- **5.10** Volatile POHC Destruction and Revoval Efficiency
- **5.11** O2/CO/HC Emissions (CEMS Output)
- 5.12 Cross Reference Data Table for Stack Gas Sampling and Analysis
- **6.1** Ash Characterization
- **6.2** APCE Effluent #1 Characterization
- **6.3** APCE Effluent #2 Characterization
- **6.4** Other APCE Residue Characterization
- 6.5 Cross Reference Data Table for APCE Residue Sampling and Analysis
- 7.1 Summary of Analytical Procedures and Methods
- **7.2** Volatile Surrogate Compounds, Target Recovery Criteria and Results
- 7.3 Semivolatile Surrogate Comounds, Target Recovery Criteria and Results
- 7.4 Volatile Matrix Spike Compounds, Target Recovery Criteria and Results
- 7.5 Semivolatile Matrix Spike Compounds, Target Recovery Criteria and Results
- **7.6** Dioxin and Furan, Semivolatile, and PAH Sampling Surrogate Spike Compounds with Target Recoveries and Results
- 7.7 Dioxin and Furan Isotope Dilution Internal Standard Spike Compounds with Target Recoveries and Results
- **7.8** PAH Isotope Dilution Internal Standard Spike Compounds with Target Recoveries and Results
- 7.9 Summary of Field Quality Control Sample Requirements and Results
- 7.10 Sample Holding Times and Temperatures as Received
- 7.11 Sampling Equipment Calibration Requirements and Results
- **7.12** Summary of Laboratory Analytical Quality Control Checks, Frequencies, and Acceptance Criteria
- **8.1** Proposed Operating Limits
- 9.1 Method Detection Limits (MDL's) for Analytes Used in Risk Assessment
- **9.2** Method 0023A Sampling Train Operating Data (Dioxin/Furan)
- 9.3 PCDD/PCDF Emission Results TEQ Basis
- 9.4 VOC Emissions

- **9.5** SVOC Emissions
- 9.6 PAH Emissions
- 9.7 Method 0040 Sampling Train Operating Data (Tedlar Bags
- 9.8 Total Organic Emissions (TOE)
- 9.9 Particle Size Distribution Results
- **9.10** Sampling Train Operating Data for Particle Size Distribution Determination (PSDD)
- 9.11 PCB Emissions Totals
- **9.12** PCB Emissions Coplanar
- 9.13 Cross Reference Data Table for Risk Sampling and Analysis

FORMAT REQUIREMENTS

General Requirements

- 1. Tables provided in this report format are provided only for guidance. Tables may be revised as necessary as long as all required information remains in the test report.
- 2. Table of Contents must refer to specific volume and page numbers. Each page of the report (including appendices) shall have a unique page number. Reports need not be numbered sequentially throughout all volumes, as long as each page in each volume contains a unique page number. Example: Page 17 of Appendix E may be numbered as E-17.
- 3. Reports for two combustion units may be combined only if they are of similar type (e.g., liquid injection).
- 4. All hard copies of the report shall be 2-sided. At least five paper copies shall be required two for LDEQ review, one for EPA review, one for the parish library, and one for LDEQ permanent records. Additionally, a CD containing the information in the main body of the report in PDF and the tables in Excel or PDF must be submitted to LDEQ. Applicant shall contact the LDEQ permit writer for specific instructions.
- 5. Tables shall either be included in the back of the same section as the discussion or put together in a separate, clearly marked section.
- 6. Any appendix that amounts to more than one volume shall be designated by the appendix letter followed by sequential 1, 2, 3.
- 7. Report volumes shall be limited to ring binders three inches or less in size.
- 8. Each bound volume, including appendices, shall be tabbed and indexed by section.

Analytical Data Package Format

This format applies to all data packages submitted in accordance with Appendix I and any stack sampling analysis submitted in Appendix A. All data packages must include the name of the laboratory and page numbers on each page. The Lab Analysis Coordinator or Lab Manager must certify that he/she has reviewed the report and all of the data meets the data quality objectives, except as noted. Data packages must be separated in tabbed sections by lab and sample method at a minimum, but should be broken down further by condition and run if practical.

- A. Table of Contents
- **B.** Data Narrative. Include type of samples analyzed, date samples received; condition and temperature (if applicable) of samples on arrival, especially samples that were defective, exceeded temperature guidance, or were outside of holding times; holding times; methods for storing, preparing, and analyzing samples; deviations from planned preparation or analysis; flagged data with discussion on reasons, significance, and corrective action.
- C. Chain of Custody and/or Request for Analysis Forms
- D. Sample Log with ID numbers, cross referenced to field ID numbers if different
- E. Data, in CLP-like format
 - **E.1** Sample ID name and number
 - **E.2** Analytical method followed
 - **E.3** Matrix type
 - **E.4** Date, time, and location of sample collection
 - **E.5** Temperatures of sample when received (if applicable)
 - **E.6** Detailed Chromatogram Integration Report. *Include how compounds were identified, retention time, area under the curve, calculated amount, flag if the*

peak is manually integrated, documentation on how and why peak is manually integrated and scan vs. database for spectral matches. Spectra displays should include the scan number or retention time of the peak being scanned. Chromatogram and spectra displays must include the laboratory sample ID number, instrument number, and identity of the analyst performing the analysis.

- **E.7** Result of the sample analysis and units associated with the number value
- **E.8** MDL, and reporting limit or SQL (if different than MDL)
- F. Lab QA/QC
 - **F.1** Lab equipment used. *Include information on instrumentation, such as type, model number, serial number, specifications of column used, etc.*
 - **F.2** Description of calibration standards. *Identify all analytes used in the calibration*.
 - F.3 Calibration data
 - **F.4** Identification of all reportable data
 - **F.5** Identification of any sample contamination
 - **F.6** Precision and accuracy results
 - **F.7** Surrogate standards
 - F.8 Surrogate recoveries
 - F.9 Lab control spikes
 - **F.10** Spike recovery
 - **F.11** Matrix spike and matrix spike duplicate results
 - **F.12** Blank sample results
 - **F.13** SQL determination summary (if applicable)
 - **F.14** Quality Control Exception Report
 - **F.15** Planned versus actual data quality objectives
- **G.** Example Calculations. For ANY and ALL calculations in the report, including units on everything. Equations must be explained in detail and contain any necessary references to equation development and data used in the equations.
- H. Certification that all methods and SOPs were correctly followed
- I. Certification of Lab Accreditation